

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**UNITED STATES OF AMERICA and  
COMMONWEALTH OF  
MASSACHUSETTS *ex rel.* JULIO  
ESCOBAR and CARMEN CORREA**

Relators—Plaintiffs,

v.

**UNIVERSAL HEALTH SERVICES, INC.,  
UHS OF DELAWARE, INC., and HRI  
CLINICS, INC.**

Defendants.

**C.A. No. 11-CV-11170-DPW**

**JOINT STATUS REPORT**

In response to the Court’s July 26, 2019 Order (ECF No. 280) that the Parties provide the Court with reports every 30 days concerning the status of the case and settlement negotiations, the Commonwealth of Massachusetts (the “Commonwealth”) and Relators Julio Escobar and Carmen Correa (collectively, the “Relators”), together with Defendants Universal Health Services (“Universal”), UHS of Delaware, Inc. (“UHS-DE”), and HRI Clinics, Inc. (“HRI”) d/b/a Arbour Counseling Services (“Arbour”) (collectively, “Defendants”) jointly file this status report.

As noted previously, the United States, the Commonwealth, and Defendants have agreed in principle on a settlement and are working to memorialize the remaining terms. (Relators have not yet determined whether they will assent to the settlement agreement.) The United States, the Commonwealth and the Defendants have circulated a number of draft settlement agreements, provided comments thereon, and have had several telephonic conversations regarding the

agreement's terms. The United States, the Commonwealth and Defendants believe that execution of a final settlement agreement may take 1-to-2 months from the filing of this report. Accordingly, the Parties jointly request that the Court continue to stay all deadlines in this matter so they can focus on finalizing the terms of an agreement.

Respectfully submitted,

COMMONWEALTH OF  
MASSACHUSETTS

By its attorney,

MAURA HEALEY  
Attorney General

Dated: November 25, 2019

/s/ Philip Schreiber  
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UNIVERSAL HEALTH SERVICES, INC.,  
UHS OF DELAWARE, INC., AND HRI  
CLINICS, INC.

By their attorneys,

Dated: November 25, 2019

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JULIO ESCOBAR &  
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By their attorneys,

Dated: November 25, 2019

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**CERTIFICATE OF SERVICE**

I certify that, on November 25, 2019, this document (filed through the ECF system) will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Philip Schreiber  
Philip Schreiber